UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

Dolcefino Communications LLC,	§	
	§	
Plaintiff,	§	
	§	
V.	§	Civil Action 4:21-cv-3326
	§	
U.S. Department of Housing and	§	
Urban Development,	§	
Defendant.	§	

Defendant's Unopposed Motion to Continue the Answer Deadline and Initial Conference

Defendant U.S. Department of Housing and Urban Development (HUD) respectfully moves to continue its answer deadline by 30 days from November 18, 2021, to December 20, 2021, and to continue the initial conference currently scheduled for December 17, 2021, to a date that follows the new deadline. Plaintiff is unopposed.

On October 11, 2021, Plaintiff filed suit against HUD under the Freedom of Information Act (FOIA) seeking disclosure of documents in HUD's possession. (Dkt. 1¶1.) In an effort to resolve this litigation, on November 11, 2021, Plaintiff provided Defendant a list of the records they seek. Defendant requires time to review the request, assess the universe of relevant documents, and review them with an eye to production to Plaintiff.

Therefore, Defendant respectfully requests additional time before it must

answer Plaintiff's complaint and appear at an initial conference. Defendant hopes to resolve this matter without expending the Court's resources.

Submitted respectfully,

Jennifer B. Lowery Acting United States Attorney

/s/ Annalisa L. Cravens

Annalisa L. Cravens Assistant United States Attorney Attorney-in-Charge Southern District No. 2791281 Texas Bar No. 24092298 1000 Louisiana Street, Suite 2300 Houston, Texas 77002

Tel.: (713) 567-9489 Fax: (713) 718-3303

Annalisa.Cravens@usdoj.gov

Counsel for Defendant

Certificate of Conference

I certify that on November 16, 2021, I conferred with counsel for Plaintiff, who is unopposed to the relief sought in this motion.

/s/ Annalisa L. Cravens

Annalisa L. Cravens Assistant United States Attorney

Certificate of Service

I certify that on November 16, 2021, the foregoing was filed through the Court's CM/ECF system, which will serve all parties and counsel registered.

/s/ Annalisa L. Cravens

Annalisa L. Cravens Assistant United States Attorney